



140 Grand Street, Suite 705, White Plains, New York 10601
t 914.686.1500 • f 914.487.5000 • www.yankwitt.com

White Plains, NY
Atlantic City, NJ

June 9, 2025

Via ECF

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
The Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY
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Re: *Just Construction Recruitment Ltd. v. Jacob Companies, Inc.*, No. 1:25-cv-3550
(MKV) (S.D.N.Y.)

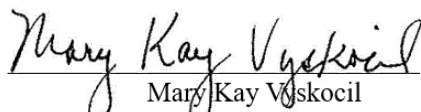
Dear Judge Vyskocil:

We were recently retained to represent defendant Jacob Companies, Inc. (“Defendant”) in the above-referenced action. We write pursuant to Rule 2(G) of the Court’s Individual Practices in Civil Cases to request a two-week extension of Defendant’s time to respond to plaintiff Just Construction Recruitment Ltd.’s (“Plaintiff”) amended complaint (the “Amended Complaint”), which is currently due on Thursday, June 12, 2025. We make this extension request to allow this firm, which was only recently retained, adequate time to confer with our client, investigate the Amended Complaint’s allegations and prepare a response. On June 6, 2025, Defendant consulted Plaintiff’s counsel, who indicated Plaintiff does not consent to this extension. This is Defendant’s first request for additional time.

Defendant respectfully requests that the Court grant Defendant until June 26, 2025, to respond to the Amended Complaint.¹ We thank the Court for its time and consideration.

Granted. SO ORDERED. Respond to the AC by
June 26, 2025. No further extensions of this deadline
will be granted absent extraordinary circumstances.

Date: June 9, 2025
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully submitted,
YANKWITT LLP

By: 
Nathaniel M. Putnam

¹ Defendant contests personal jurisdiction and venue and reserves all other Fed. R. Civ. P. 12(b) defenses.